

LAW OFFICES OF RANDOLPH H. GOLDBERG
RANDOLPH H. GOLDBERG, ESQ.
State Bar No. 5970
4000 S. Eastern Avenue, Suite 200
Las Vegas, NV 89119
(702) 735-1500

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

* * * * *

In re:)	BANKRUPTCY NUMBER:
)	BK-S-07-11832-LBR
ADAM SCHULTHEIS &)	Chapter 13
CYNTHIA SCHULTHEIS)	DATE: 7/28/2010
)	TIME: 10:30 AM
)	
Debtor(s) .)	
_____)	

OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Comes now, Randolph H. Goldberg, Esq., to Oppose the Motion for relief from automatic stay. Randolph H. Goldberg Esq., respectfully requests that the Honorable Judge Linda B. Reigle continue the Motion for relief from automatic stay or in alternative work out an adequate protection order between the debtors and Bank of America NA.

In support of this opposition, Randolph H. Goldberg, Esq., states as follows:

A Motion for relief from automatic stay was filed by Bank of America and set for hearing on July 28, 2010. The debtor is in the process of a loan modification through home safe america. The loan modification is still being worked out between the lender and home safe america.. The debtor ask that the court continue this matter so that the stay remains in place and the debtor can continue to work on her loan modification. The debtor asks for a 60 day continuance due to the length of time loan modifications are taking for lenders to review.

The debtors pray the court continue the motion for relief from automatic stay 60 days so that the debtor has time to continue working on the loan modification.

DATED this _____ day of July, 2010.

LAW OFFICES OF
RANDOLPH H. GOLDBERG

By /s/ Randolph H. Goldberg
RANDOLPH H. GOLDBERG, ESQ.
4000 S. Eastern
Ste. 200
Las Vegas, NV 89119
Attorney for Debtor

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Nevada State Bar no. 5970

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CYNTHIA SCHULTHEIS) Chapter 13
11)
12) DATE: 7/28/2010
Debtor.) TIME: 10:30 AM
)

13 CERTIFICATE OF FAX TRANSMISSION RE: OPPOSITION TO MOTION FOR
14 RELIEF FROM AUTOMATIC STAY

15 I, ADAM PARMELEE, hereby by certify that a copy of
16 the OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY, in the
17 above-entitled case, was faxed by me on the 1st day of JULY
2010 by faxing copies thereof to the parties as
18 follows:

19 **GREGORY L. WILDE**
20 208 S. JONES BLVD.
21 LAS VEGAS, NV 89107
(702) 258-8200
(702) 258-8787 (fax)

22
23 **KATHLEEN A. LEAVITT**
24 201 LAS VEGAS BLVD., SO. #200
25 LAS VEGAS, NV 89101
(702) 853-0713

26
27

1

2 DATED this ____1 day of JULY, 2010

3

/S/ ADAM PARMELEE

4

An Employee of

THE LAW OFFICE OF

5

RANDOLPH H. GOLDBERG, ESQ.

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